

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

Granted on 12/01/14. Docket 193 shall
be marked as withdrawn.
s/William T. Lawrence, Judge

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	CAUSE NO.: 1:13-cr-00150-WTL-TAB
v.)	
)	
GUOQING CAO,)	-01
SHUYU LI,)	-02
)	
Defendants.)	

**GOVERNMENT'S MOTION TO WITHDRAW ITS OBJECTION
TO DEFENDANT CAO'S THIRD MOTION FOR MODIFICATION
OF PRETRIAL RELEASE CONDITIONS**

The United States of America, by counsel, Josh J. Minkler, Acting United States Attorney for the Southern District of Indiana, and Cynthia J. Ridgeway, Assistant United States Attorney, respectfully moves to withdraw and correct its formerly lodged objection to defendant Cao's third request to modify the conditions of release. In support thereof, the government would show the following:

1. On November 14, 2014, the government objected to defendant Cao's third motion for modification of pretrial release conditions. In the government's motion, it stated that the investigative facts of the case had not changed, nor had the impact on the victim company or American innovation lessened.
2. On November 12, 2014, the government received additional information from the victim company regarding what was believed to be uncharged scientific information. This newly received information *does* change the investigative facts initially relied upon by the government and the magnitude of the same is being carefully considered.

At this time, the government is working to fully understand the scope of the additional information and any correlation it has to the charges in Count One of the Second Superseding Indictment. Indeed, on November 21, 2014, defendant Cao made known his claim that the information is the same as some of the information alleged to have been misappropriated in Count One.

3. For the foregoing reasons, the government respectfully withdraws its objection to defendant Cao's Third Motion For Modification of Pretrial Release Conditions, and furthermore does not object were the Court to grant the same without delay.

WHEREFORE, for the foregoing reasons the government corrects its assertion and withdraws its objection to defendant Cao's Third Motion for Modification of Pretrial Release Conditions.

Respectfully submitted,

JOSH J. MINKLER
Acting United States Attorney

By: /s/ Cynthia J. Ridgeway
Cynthia J. Ridgeway
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the Defendants, by and through operation of the Court's e-filing system. The parties may access the filing by operation of the Court's electronic filing system.

/s/ Cynthia J. Ridgeway

Cynthia J. Ridgeway
Assistant United States Attorney

Office of the United States Attorney
Ten West Market Street, Suite 2100
Indianapolis, IN 46204
(317) 226-6333
cynthia.ridgeway@usdoj.gov